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June 14, 2021

**VIA ECF**

Hon. Victor Marrero, U.S.D.J.  
United States District Court  
Southern District  
Daniel Patrick Moynihan Courthouse  
500 Pearl St., 15 B  
New York, NY 10007-1312

**Re: Matter 1: Hartford Fire Insurance Company a/s/o Smith Affiliates Management Corp., d/b/a Samco Properties v. Broan-Nutone, LLC  
Docket No.: 1:20-cv-01292  
Matter 2: Hartford Fire Insurance Company a/s/o TCC Group, Inc., v. Broan-Nutone, LLC  
Docket No.: 1:20-cv-01292 (formerly 1:20-cv-03184)**

Your Honor:

This firm represents the Defendant, Broan-Nutone, LLC, (hereinafter "Defendant") in the above consolidated matter. With the consent of my adversaries, I am writing on behalf of all parties to request a 30-day adjournment of the settlement conference and a 60-day extension of the deposition deadline in this matter. The parties believe this brief extension will facilitate a more meaningful settlement conference in late July.

More specifically, it should be noted that plaintiffs have made settlement demands to Defendant. In considering those demands, it was discovered that a number of documents were inadvertently left out of plaintiffs' document productions. Those documents are necessary to intelligently respond to plaintiffs demands and engage in a meaningful settlement conference. The parties are working cooperatively to exchange those documents, which we believe will be completed in the next week. Moreover, the parties have noticed a number of depositions for mid-July, and, if this extension is granted, will complete the remaining depositions in during the remainder of fact discovery. The parties are hopeful to have a majority of the depositions completed in July, but respectfully request until the end to September to complete depositions due to summer schedules. This is the parties' first request for an adjournment of the Settlement Conference.

The parties are available at Your Honor's convenience to further discuss this issue. Thank you for Your Honor's courtesy in this matter.

Please send mail to our scanning center at: PO Box 580, Buffalo, NY 14201

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Respectfully submitted,



Matthew G. Miller

CPM/tm

cc: All counsel of record

